



Maynard, O'Connor, Smith & Catalinotto, LLP

ATTORNEYS AT LAW

Michael E. Catalinotto
Thomas G. Daley
James R. Schultz
Bruce A. Bell
Concetta R. Lomanto
Edwin J. Tobin, Jr.
Michael E. Catalinotto, Jr.
Robert A. Rausch
Anne-Jo Pennock McTague, RN
Alexander L. Stabinski

3154 Route 9W
P.O. Box 180
Saugerties, New York 12477
(845) 246-3666
Fax (845) 246-0390

6 Tower Place
Albany, New York 12203
(518) 465-3553
Fax (518) 465-5845

www.maynardoconnorlaw.com

122 West Main Street
Johnstown, New York 12095
(518) 762-4212
Toll Free (800) 721-3553

Adam T. Mandell
Andrea P. Demers
Justin W. Gray
Aaron F. Carbone
Joseph A. Juidiciani

OF COUNSEL
Angelo D. Lomanto

**Service by Facsimile,
E-Mail or Electronic
Means is Not Accepted**
PLEASE REPLY TO
Saugerties Office

Christopher K.H. Dressler
(1980-2010)

October 9, 2014

Maher v Quality Bus

Our File No.: 149.29644

Docket No.: 14 CV 3586 (JCM)

Via ECF/CMS Only

Magistrate Judge Judith C. McCarthy
United States District Court
Southern District of New York
300 Quarropas Street, Courtroom 421
White Plains, New York 10601

SO ORDERED:

Defendant Caitlin Railo shall provide the requisite releases to Defendant Quality Bus Service, LLC or file objections pursuant to 45 C.F.R. § 164.512(e) to plaintiff Justin T. Maher's requests by October 15, 2014.


JUDITH C. MCCARTHY
United States Magistrate Judge

10-10-14


Dear Judge McCarthy:

I represent the defendant Quality Bus Service, LLC ("Quality"), in the above referenced action. I write in response to plaintiff's counsel's letter application dated October 8, 2014 (Doc. 28). Plaintiff seeks the disclosure of co-defendant Caitlin H. Railo's personnel and medical records maintained by Quality. Because those records include confidential information, Quality requests that the plaintiff obtain an authorization from Railo, or an Order from the Court, authorizing/directing disclosure. Quality has no other objection to the disclosure of those records.

Regarding the remainder of the plaintiff's document demands, inquiry has been made with our client regarding what documents, if any, it possess which are responsive. Upon receipt of those documents, a supplemental response will be forthcoming. To the extent that any documents are withheld under an asserted privilege, Quality will provide a privilege log. Accordingly, it is respectfully submitted that it would be premature for the Court to render a determination on those remaining demands at this time. Thank you.

Respectfully submitted,

MAYNARD, O'CONNOR, SMITH & CATALINOTTO, LLP

By 
Michael E. Catalinotto, Jr., MC2315

catalinottojr@maynardoconnorlaw.com

MCJ/mla

cc: Evan Foulke (*via ECF/CMS*)
Vincent Cimini (*via ECF/CMS*)
Keith LaRose (*via ECF/CMS*)